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February 21, 2025

VIA ECF

Hon. Jennifer E. Willis
United States District Court
Southern District of New York
40 Foley Square
New York, New York 10007

Re: Charles v. Pinnacle Too, LLC, et al.
Case No. 22-CV-4232 (DEH)(JW)

Dear Judge Willis:

We represent Defendants FrankCrum6, Inc. d/b/a FrankCrum and Frank Crum Jr. (“Defendants”) in the above-referenced action. On January 31, 2025, Your Honor granted a Motion to Withdraw for Evan B. Citron, prior counsel for Defendants. (ECF No. 166). However, the ECF notification reflected that the Robert M. Tucker was inadvertently terminated as counsel, despite presently representing Defendants. Since January 31, 2025, Mr. Tucker has not received notification of any other filings or notices. As such, we respectfully request that Mr. Citron be removed as counsel for Defendants, and Mr. Tucker be restored as Defendants’ counsel of record.

Please do not hesitate to contact our office with any further questions.

Respectfully submitted,

/s/ Mary M. Delany

Mary M. Delany

MD:npa